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11 *Attorneys for the United States of America*

12  
13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,  
16 Plaintiff,

17 v.

18 CHAD HALL, D.O.; MICHAEL  
19 HALPRIN, a/k/a Michael Vincent;  
20 RONALD SMITH, M.D.; JANELL  
21 OLSON; and EGHOMWARE  
22 IGBINOVIA a/k/a Jerry Igbinovia,

23 Defendants.

24 Case No. 2:19-cr-00154-RFB-VCF

**MOTION TO CONTINUE  
DISCOVERY DEADLINES**

17 The United States, by and through undersigned counsel, hereby files this Motion to  
18 Continue Discovery Deadlines seeking a thirty day continuance of the government's Rule  
19 16 deadline, the defendants' reciprocal discovery deadline, the parties' expert disclosure  
20 deadline and the pretrial motions deadlines.

21 On August 23, 2019, this Court held a status conference and set various deadlines  
22 for discovery and other Rule 16 disclosures, providing that the government's Rule 16  
23 discovery deadline would be set for January 10, 2020, the defendants' reciprocal discovery  
24 deadline would be February 10, 2020, and the expert disclosure deadline would be

1 February 10, 2020. ECF No. 87. The Court further set the deadline for pretrial dispositive  
2 motions for March 2, 2020, with responses due March 30, 2020. *Id.* The Court also  
3 continued the trial date to June 8, 2020 in this case. *Id.*

4 Since the August hearing, the government produced Rule 16 discovery, returned all  
5 property required to be returned according to the deadlines set forth by the Court and has  
6 continued to review and attempt to identify electronic items it may seek to use in its case  
7 in chief at trial.

8 The government now moves for a thirty-day continuance of the government's Rule  
9 16 discovery deadline, the defendants' reciprocal discovery deadline, the expert disclosures  
10 deadline and the pretrial motions and responses deadlines due to the imminent departure  
11 from the US Attorney's Office of undersigned counsel. The case is being transitioned to  
12 other government counsel and thus the government seeks this continuance to allow the  
13 attorneys that will be prosecuting the case an opportunity to assess for themselves the  
14 evidence to be disclosed and used at trial and the ability to identify experts of their  
15 choosing. In the interest of fairness, the government thus also seeks to continue the  
16 defendants' reciprocal discovery deadline and pretrial motions and responses deadlines  
17 accordingly.

18 The government met and conferred with counsel for the defendants prior to filing  
19 this motion. Counsel for defendants Igbinovia, Olson and Smith agreed to file a joint  
20 stipulation continuing all pending dates, including the trial date, for thirty days. In  
21 addition to the government's basis for seeking the continuance, counsel for Olson has been  
22 in trial in *United States v Palafox*, 2:16-cr-00265-GMN-NJK for the past several months and  
23 it is not anticipated that the case will be submitted to the jury before the end of January

1 2020. Counsel for Hall advised today that Hall did not stipulate to the continuance.

2 Accordingly, the government filed the instant motion.<sup>1</sup>

3 Given that all defendants remain at liberty on pretrial release, that the currently  
4 scheduled trial date is several months away, and the need for both the government and at  
5 least some defendants to have additional time to meet the January and February  
6 deadlines, the government requests that the Court grant this motion. The motion is  
7 brought in good faith and not for purposes of delay.

8 **WHEREFORE** the government respectfully requests that the Court grant the  
9 motion to continue and continue the government's Rule 16 discovery deadline, currently  
10 set for January 10, 2020 to February 10, 2020, continue the defendants' reciprocal  
11 discovery deadline from February 10, 2020 to March 10, 2020, and continue the expert  
12 disclosure deadline to March 10, 2020. The government further requests that the Court  
13 continue the pretrial motions deadline to April 2, 2020, and responses thereto to April 30,  
14 2020.

15 Respectfully submitted this 7th day of January, 2020.

16 NICHOLAS A. TRUTANICH  
17 United States Attorney

18 *s/ Nadia Ahmed*  
19 NADIA AHMED  
20 Assistant United States Attorney

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23  
24 <sup>1</sup> As of the time of filing the motion, the government had not yet heard from counsel for  
defendant Halprin.

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

V.

CHAD HALL, D.O.; MICHAEL HALPRIN, a/k/a Michael Vincent; RONALD SMITH, M.D.; JANELL OLSON; and EGHOMWARE IGBINOVIA a/k/a Jerry Igbinovia,

## Defendants.

Case No. 2:19-cr-00154-RFB-VCF

## ORDER

CHAD HALL, D.O.; MICHAEL HALPRIN, a/k/a Michael Vincent; RONALD SMITH, M.D.; JANELL OLSON; and EGHOMWARE IGBINOVIA a/k/a Jerry Igbinovia,

## Defendants.

Based on the Motion to Continue filed by the government, and good cause appearing therefore, IT IS HEREBY ORDERED that

The government's Rule 16 discovery deadline currently set for January 10, 2020, is vacated and continued to February 10, 2020.

The deadline for expert disclosures currently set for February 10, 2020, is vacated and continued to March 10, 2020.

The Defendants' reciprocal discovery deadline currently set for February 10, 2020, is vacated and continued to March 10, 2020.

Pretrial dispositive motions deadline currently set for March 2, 2020, be continued to April 2, 2020, with responses due April 30, 2020.

IT IS SO ORDERED.

DATED 8th day of January, 2020.

SP

**RICHARD F. BOULWARE**  
United States District Court Judge

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2                   **CERTIFICATE OF SERVICE**

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4                   I hereby certify that on January 7, 2020, I electronically served on each Counsel of  
5                   Record the foregoing Motion to Continue Discovery Deadlines by filing it with the Clerk  
6                   of Court for the United States District Court for the District of Nevada using the  
7                   CM/ECF system.

8                   \_\_\_\_\_  
9                   *s/ Nadia Ahmed*  
10                   NADIA AHMED  
11                   Assistant United States Attorney